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March 20, 2015

Via Federal Express

U.S. Environmental Protection Agency
Leslie Patterson, Remedial Project Manager
77 West Jackson Boulevard (SR-6J)
Chicago, IL 60604-3590

**Re: Response to Special Notice Letter for the South Dayton Dump & Landfill Site
in Moraine, Ohio**

Dear Ms. Patterson:

This letter is the response of Dayton International, Inc. to the Environmental Protection Agency Region Five's ("EPA") Special Notice Letter dated January 16, 2015 regarding the South Dayton Dump & Landfill site in Moraine, Ohio. Day International respectfully declines the U.S. EPA's invitation to participate in response actions for the South Dayton Dump & Landfill site. As a defendant in the pending litigation *Hobart Corporation, et al., v. The Dayton Power and Light Company, et al.*, Case Number 3:13-cv-0115, S.D. Ohio, Dayton International has assessed the allegations that it is liable under CERCLA for remediation activities, including discovery of the plaintiffs, and communications with Attorney Thomas Nash of your agency, and has found no credible evidence of liability. On March 28, 1961, Dayco, (an entity to whom Day International traces the origin of certain of its rubber printing products) sold the assets of its tire division to Dayton Tire & Rubber Company, a wholly owned subsidiary of Firestone. The tire division facility was the only industrial or manufacturing facility of Dayco located in the Dayton area at that time. That facility and all of its related tire production assets were conveyed to Dayton Tire & Rubber Company. After that date, Dayco, and subsequently Day International, neither owned nor operated any manufacturing or industrial facilities within the Dayton area.

In an e-mail correspondence dated September 20, 2012 from U.S. EPA counsel Thomas Nash to then Flint Group corporate counsel Larry King (Exhibit 1), Mr. Nash explains why U. S. EPA believes Day International is liable under CERCLA for remediation of the South Dayton Dump and Landfill:

"The Grillot deposition provided additional evidence of a nexus between Dayton Tire & Rubber and this site. I think Day International received this general notice because we thought DT&R had been a predecessor or affiliate of Day International."

The "Grillot deposition" referenced is the deposition of Mr. Edward Grillot taken on April 24, 2012 (Exhibit 2), in a prior litigation regarding CERCLA liability for the South Dayton Dump & Landfill site. In that deposition, Mr. Grillot's testimony describes recollections of Dayton Tire & Rubber trucks from his boyhood.

At page 132 of the Grillot deposition, Mr. Grillot was asked at what age he recalled first seeing Dayton Tire & Rubber trucks at the South Dayton Landfill. His response was "Maybe 10 or 12, something like that". At page 130 of Exhibit 2, Mr. Grillot testified that he recalled seeing Dayton Tire & Rubber trucks because he remembered the horse logo (identified as Exhibit 4 in the deposition). In that same deposition, at page 260 of Exhibit 2, upon cross examination, Mr. Grillot identified when he first recalled seeing the horse logo:

Q: Was there any period of time after you were 10 or 12 years old that you remember Dayton Tire & Rubber bringing material to the site?

A: I think I mentioned -- I'm not 100% sure at this point, but I think I said when I was younger I remember the horse on the emblem. That stuck with me.

Q: So was that when you were 10 or 12 or -- ?

A: I think I was younger than that.

Q: How old were you when you when you remember seeing the horse on the emblem?

A: Maybe 8 or 9 when I started getting in to the dump itself.

Q: So if I understand your testimony then, the period of time during which you recall seeing trucks like which you believe were Dayton Tire & Rubber trucks because you remember the horse emblem --

A: Right.

Q: -- was from the time you were about 8 until the time you were about 12; is that fair?

A: Yeah.

Q: Is that the sum total of the period of time that you recall seeing these trucks that you associate with Dayton Tire & Rubber at the facility?

A: I associated tires with the particular trucks that came in. And so when I worked for Doyle's Auto Parts I don't remember whose trucks would dump and whose truck would haul off. As I mentioned before, that was I

think around when recapping came in. So there would be big trucks that were engaged that had - - so I don't know.

Q: So you may - - what you're saying is, you may be confusing trucks coming in to unload material with trucks that are actually taking tires off the site from Doyle's? Is that what you were telling me?

A: Well, I can see 'em take 'em off. That's obvious. But as far as how many would end up, you know, on our side of the fence - - and what I mean, Doyle's Auto Parts at that time he had plenty of tires, too. So the operation could get real confusing. You know, I'm working. I'm not really - - I would just observe real quick what was going on.

Q: But as you sit here today, to the best of your recollection, the time period during which you recall trucks you associated with Dayton Tire & Rubber coming on to the site to dispose of materials was this period of time from when you were about 8 to when you were 12; is that fair?

A: Mm - Hmm. They built a big building over by the dump along I-75.

Having been born on November 9, 1952 (Exhibit 2 at page 10) Mr. Grillot would have only been 8 years old when Dayco's tire producing assets were sold to Dayton Tire & Rubber Company. Therefore, from his earliest recollection, Mr. Grillot would have been observing the logo and vehicles of Dayton Tire & Rubber Company (a subsidiary of Firestone). In fact, the logo that he identified as Exhibit 4 bears the name "Dayton Tire & Rubber Company" indicating that the trucks he identified by that logo would have been observed after the tire producing assets of Dayco had been sold.

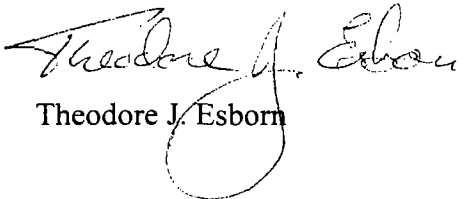
Mr. Grillot's confusion about his perceptions of the Dayton Tire & Rubber trucks on the South Dayton Landfill site is further underscored by documents presented in the current pending lawsuit *Hobart Corporation, et al., v. The Dayton Power and Light Company, et al.*, Case No. 3:13-cv-0015, in the United States District Court for the Southern District of Ohio, in which lawsuit Day International is a named defendant. In that litigation, another defendant, Bridgestone Americas Tire Operations, LLC has filed with the court in its Federal Rule 26 Disclosure Statement a letter from Mr. Dennis R. Mantel, Vice President of Sales, Industrial Waste Disposal Co., Inc. to Mr. Ralph Ball of Dayton Tire & Rubber, dated May 7, 1980 (Exhibit 3). In that letter, Mr. Mantel provides the name and location of every sanitary landfill utilized by Industrial Waste Disposal in providing waste disposal services for Dayton Tire & Rubber from 1956 until May 7, 1980. The South Dayton Dump and Landfill was not among those landfills listed. If the tire production facility operated by Dayton Tire & Rubber Company, and previously by a division of Dayco, utilized a solid waste hauler who transported that facility's wastes to other landfills, then the Dayton Tire & Rubber trucks recalled by Mr. Grillot would likely have been involved in tire recapping operations associated with Doyle's Auto Parts, (the auto reclamation operation that operated adjacent to the South Dayton Dump and Landfill) as Mr. Grillot suggests could have been the case.

U.S. Environmental Protection Agency
Leslie Patterson, Remedial Project Manager
March 20, 2015
Page 4

Further, in the current *Hobart* litigation, in response to Day International's discovery requests, the only evidence offered by plaintiffs other than the Grillot deposition is a 1977 solid waste profile purportedly prepared by the Dayton Tire & Rubber Company (Exhibit 4). The document itself does not refer to any particular facility or address. In fact, the document does not even identify or reference the Dayton Tire & Rubber Company. Since this report was prepared 16 years after Dayco sold its tire producing assets to Dayton Tire & Rubber Company, it bears no relevance to wastes produced by Dayco's tire operations prior to 1961, or to where those wastes may have been disposed.

Since neither US EPA nor plaintiffs in the current *Hobart* litigation have produced any credible information or evidence to support a contention that Day International, Inc., disposed of hazardous wastes at the South Dayton Dump and Landfill, Day International, Inc. respectfully declines to participate in negotiations to perform remediation activities at that site.

Very truly yours,



Theodore J. Esborn

cc: Peter Schreck, Day International, Inc.
Thomas Nash, Esq., US EPA

EXHIBIT 1

Re: South Dayton Dump & Landfill 

Larry King to: Thomas Nash

Cc: Carol Ropski

09/26/2012 02:53 PM

Based on the material available to us, we do not believe that Day International Inc. is a successor in interest to Dayton Tire & Rubber with respect to liability for activities at the South Dayton Landfill.

Day International Inc. a Delaware corporation was incorporated as the Matthew Ress Company on September 20, 1990 and later that year, changed its name to Day International Inc. It purchased certain assets and liabilities from Day International Corporation, a Michigan corporation. At the time, both entities were subsidiaries of M A Hanna (currently believed to be Poly One Corporation). Day International Inc manufactures rubber blankets and other rubber products for the printing industry. A portion of those business operations trace their origin to certain operations of Dayton Rubber Manufacturing Company, although we have no records that would enable us to determine legal entity succession.

From various public records, it appears that Dayton Rubber Manufacturing Company did at one time have interests in tire manufacturing. We have no records which would indicate the legal entity structure of that business. Former executives of Day International Inc to whom we talked to as part of the investigation into this matter, indicated that all interest in the tire business were sold to Firestone in or prior to 1961 and it is believed that all related liabilities were assumed by Firestone. We believe that Firestone is now part of or affiliated with Bridgestone.

If you are aware of any further documents which you believe connect Day International Inc to the site, please provide them to us and we will promptly review them. Otherwise, we do not believe Day International Inc has responsibility for the site.

Lawrence E. King
Vice President Administration, General Counsel & Secretary
Flint Group
14909 N. Beck Road
Plymouth, MI 48170
T +1 734 781 4630
F +1 734 781 4699
larry.king@flintgrp.com

Thomas Nash

Mr. King The Grillot deposition provided addition...

09/20/2012 03:57:46 PM

From: Thomas Nash <Nash.Thomas@epamail.epa.gov>
To: Larry King <larry.king@flintgrp.com>,
Cc: Carol Ropski <Ropski.Carol@epamail.epa.gov>, Thomas Nash
<Nash.Thomas@epamail.epa.gov>
Date: 09/20/2012 03:57 PM
Subject: Re: South Dayton Dump & Landfill

Mr. King

The Grillot deposition provided additional evidence of a nexus between Dayton Tire & Rubber and this Site. I think Day International received this general notice because we thought DT&R had been a predecessor or affiliate of Day International.

**Exhibit 1 to Day International's
Special Notice Letter Response**

Thanks, Tom

(c) Thomas C. Nash
Associate Regional Counsel
phone: 312-886-0552
fax: 312-886-7160 or 312-886-0747
email: nash.thomas@epa.gov

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Larry King ---09/20/2012 12:46:24 PM---I have now been through the deposition carefully, and I have found no reference to Day International

From: Larry King <larry.king@flintgrp.com>
To: Carol Ropski/R5/USEPA/US@EPA,
Cc: Thomas Nash/R5/USEPA/US@EPA
Date: 09/20/2012 12:46 PM
Subject: Re: South Dayton Dump & Landfill

I have now been through the deposition carefully, and I have found no reference to Day International Inc., or to my knowledge, any predecessor or affiliated entity. If I have missed the reference, perhaps you could direct me. Are there any other documents in the possession of EPA that would in any way link Day International Inc to the site? If so, please provide copies. Thank you.

Lawrence E. King
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Carol Ropski --09/19/2012 06:09:12 PM---Dear Mr. King, Attached are the documents linking Day International, Inc. to the South

From: Carol Ropski <Ropski.Carol@epamail.epa.gov>
To: larry.king@flintgrp.com,
Cc: Thomas Nash <Nash.Thomas@epamail.epa.gov>
Date: 09/19/2012 06:09 PM
Subject: South Dayton Dump & Landfill

Dear Mr. King,

Attached are the documents linking Day International, Inc. to the South Dayton Dump & Landfill site pursuant to your September 17, 2012 letter.

Sincerely,

Carol Ropski
Enforcement Services Section 1
(312) 353-7647

(See attached file: South Dayton Edward Grillot deposition transcript_full size (01228020)[1].pdf)(See attached file: South Dayton Edward Grillot deposition_word index (01228021)[1].txt)(See attached file: South Dayton Edward Grillot deposition transcript_full size (01228020)[1].pdf)(See attached file: South Dayton Edward Grillot deposition_word index (01228021)[1].txt)[attachment "South Dayton Edward Grillot deposition transcript_full size (01228020)[1].pdf" deleted by Thomas Nash/R5/USEPA/US] [attachment "South Dayton Edward Grillot deposition_word index (01228021)[1].txt" deleted by Thomas Nash/R5/USEPA/US]

EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO

HOBART CORPORATION, et al.,)

)

Plaintiffs,)

)

-vs-

) Case No. 3:10-CV-195

)

WASTE MANAGEMENT OF OHIO,)

INC., et al.,)

)

Defendants.)

DEPOSITION OF EDWARD GRILLOT taken by me,
Susan L. Bickert, a Certified Shorthand Reporter
and Notary Public in and for the State of Ohio, at
large, pursuant to the Federal Rules of Civil
Procedure, as upon Direct Examination, at the
offices of Thompson Hine, LLP, Austin Landing I,
10050 Innovation Drive, Suite 400, Dayton, Ohio
45342, on Tuesday, April 24, 2012, commencing at
10:10 o'clock a.m. on behalf of the Plaintiffs.

**Exhibit 2 to Day International's
Special Notice Letter Response**

1 APPEARANCES:

2 ON BEHALF OF THE PLAINTIFFS:

3 LARRY SILVER, Esq.

Langsam Stevens Silver &

4 Hollaender LLP

1616 Walnut Street, Suite 1700

5 Philadelphia, Pennsylvania 19103-5319

6 ON BEHALF OF PLAINTIFF NCR:

7 J. WRAY BLATTNER, Esq.

Thompson Hine LLP

8 Austin Landing I

10050 Innovation Drive, Suite 400

9 Dayton, Ohio 45342-4934

10 and

11 E. CAMILLE YANCEY, Esq.

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12 312 Walnut Street, 14th Floor

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ON BEHALF OF DEFENDANT CARGILL:

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17 ON BEHALF OF DEFENDANT DAYTON TIRE &

RUBBER:

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ON BEHALF OF DEFENDANT PHARMACIA CORP.

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2 WILLIAM H. HARBECK, Esq.

Quarles & Brady

3 411 East Wisconsin Avenue, Suite 2040

Milwaukee, Wisconsin 53202

4 ON BEHALF OF DEFENDANT DP&L:

5 FRANK L. MERRILL, Esq.

6 Bricker & Eckler LLP

100 South Third Street

7 Columbus, Ohio 43215

8 ON BEHALF OF THE EPA:

9 THOMAS C. NASH, Esq.

U.S. Environmental Protection Agency

10 Office of Regional Council

Mail Code C-14J

11 77 West Jackson Blvd.

Chicago, Illinois 60604-3590

12 ON BEHALF OF DEFENDANT VALLEY ASPHALT:

13 MARTIN H. LEWIS, Esq.

14 (Via Telephone)

Tucker Ellis & West LLP

15 1150 Huntington Building

925 Euclid Avenue

16 Cleveland, Ohio 44115

17 ALSO PRESENT:

18 Ken A. Brown, ITW

Scott Arentsen, DP&L

19 Kaitlyn Harantschuk, Legal Assistant

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1 the future or the present.

2 Q If you can think of the future, I'm
3 going to ask you a few questions, too. Yeah, we'll
4 focus a little bit on the future, but mostly on the
5 past.

6 Also, if you need a break for any reason or
7 just getting tired, we'll take a lunch break, but
8 if you need --

9 A Okay.

10 Q -- a comfort break or anything else,
11 please speak up.

12 You also may hear some objections and
13 banter between the attorneys during the course of
14 the questioning. Think of that more like a hockey
15 game that breaks out into a little scuffle.

16 A Okay.

17 Q We'll get back to the hockey game
18 pretty quickly, and I'll let you know that.

19 A Okay.

20 Q All right. So those are the basic
21 questions. Let's start with your date of birth.

22 A 11-9-52.

23 Q And that would make you how old?

24 A Fifty-nine.

25 Q And let me ask you about your place of

1 A Desks, some books. But we got a lot
2 of like wooden cabinets and stuff like that.

3 Q Was that burnable stuff?

4 A Yeah, mm-hmm.

5 Q Gum under the desk?

6 A Pardon me?

7 Q Gum under the desk?

8 A Well, no.

9 Q All right. What about Dayton Tire
10 and Rubber Company?

11 A Pardon me?

12 Q Dayton Tire and Rubber Company.

13 A What about 'em?

14 Q Yeah. Were they a customer of the
15 South Dayton Dump and Landfill?

16 A Yes.

17 Q What can you tell me about Dayton
18 Tire and Rubber Company as a customer?

19 A They brought like -- I remember a
20 lot of inner tubes 'cause we'd take the tubes up
21 and fix 'em and take 'em over to the pond and float
22 on 'em. They brought tubes, and there was a rubber
23 -- a rubber I'll call it a shroud that would come.
24 Some tires. It wasn't a whole lot that I remember.
25 Now, I think Doyle got a lot, 'cause if I'm not

1 mistaken Doyle told me -- the recapping came into
2 play at that time, so Doyle would get a lot of the
3 recap or the tires off the cars that were pretty
4 worn and stuff like that. I don't remember if
5 they'd go in to Dayton Tire or how -- where they
6 were recapped at. But I remember the big trucks
7 would come in, and they'd load all these tires up
8 and send 'em somewhere.

9 Q Now, the Dayton Tire and Rubber the
10 stuff that came from them to your operation, to the
11 landfill operation, what kind of -- did it come in
12 -- whose trucks did it come in?

13 A I remember 'em coming in in their
14 trucks.

15 Q Dayton Tire and Rubber had their own
16 trucks?

17 A Right, mm-hmm.

18 Q Hauled their own waste?

19 A Pardon me?

20 Q Hauled their own waste to South
21 Dayton Dump?

22 A Yes.

23 Q Can you describe what their trucks
24 looked like?

25 A All I remember is they had a horse

1 on 'em inside of -- they had looked like a ring and
2 then there was a horse.

3 Q Okay. This will be Exhibit Number
4 4. That's the colored version. We'll pass out the
5 black and white version.

6 (WHEREUPON, Grillot
7 Deposition Exhibit Number 4
8 was marked for
9 purposes of identification.)

10 Q All right. I'm putting in front of
11 you Exhibit 4.

12 A The horse right there.

13 Q Can you repeat that?

14 A I said I see the horse.

15 Q Is that the same horse you were just
16 referring to?

17 A Yeah.

18 Q And that's a horse in the middle of
19 that emblem?

20 A Yeah. I think someone -- either the
21 driver or Uncle Kenny or Alcine told me that they
22 made pony tires or something like that or pony
23 something. And that's what I remember from them
24 coming in.

25 Q Now, the Dayton Tire and Rubber

1 trucks that you saw -- well, let me withdraw that.

2 Do you ever remember any trucks that had
3 cages on them?

4 A Yeah.

5 Q Whose trucks were those?

6 A I don't know.

7 Q Do you remember if Dayton Tire and
8 Rubber had cages on their trucks?

9 MR. MOSS: Objection, leading.

10 THE WITNESS: I don't know.

11 BY MR. SILVER (Continuing):

12 Q And what about frequency of the
13 Dayton Tire and Rubber trucks coming into the South
14 Dayton Dump?

15 A I'd say once a week maybe.

16 Q And what period of time do you
17 remember those trucks?

18 A Through the day.

19 Q Excuse me?

20 A Through the day.

21 Q Through the day?

22 A Yeah.

23 Q And what about when you were young
24 when you first started working at repairing the
25 landfill, did you see them then?

1 MR. MOSS: Objection, leading.

2 THE WITNESS: Like I said, I just
3 remember the pony.

4 BY MR. SILVER (Continuing):

5 Q How about at what age were you when
6 you started seeing them?

7 A Maybe ten or 12, something like
8 that.

9 Q And do you remember anything else
10 that came from Dayton Tire and Rubber other than
11 what you already discussed in those trucks?

12 A That was it.

13 MR. HARBECK: I'm sorry. I didn't hear.

14 THE WITNESS: Is he talking to me?

15 BY MR. SILVER (Continuing):

16 Q Yeah, they couldn't hear your answer
17 to that question.

18 A Oh, he didn't hear. Yes. Or what
19 was the question?

20 (Whereupon, the answer was read back by
21 the court reporter.)

22 Q I just want to throw out
23 Wright-Patterson Air Force Base. Did you ever hear
24 of that location?

25 A Wright-Pat?

1 the site?

2 A I don't quite understand the
3 question.

4 Q You gave some testimony earlier
5 today --

6 A Right.

7 Q -- about your recollection of Dayton
8 Tire and Rubber sending material to the site.

9 A Right.

10 Q My question for you now, is that all
11 you recall about Dayton Tire and Rubber sending
12 product -- material to the site?

13 A Well, what I recall is, as I think I
14 mentioned earlier, that I remember getting inner
15 tubes from the dump site and taking -- all of my
16 cousins and I would take them over there and play
17 on the lake.

18 Q What I'm asking you -- and I
19 appreciate your asking for clarification. What I'm
20 asking is what you've already testified to relative
21 to Dayton Tire and Rubber, the inner tubes, I think
22 you mentioned rubber shrouds and maybe some tires.
23 Is that all you recall about Dayton Tire?

24 A At this time, yes.

25 Q Mr. Silver asked you about the

1 period of time when you recall seeing Dayton Tire
2 and Rubber trucks bringing material to the site,
3 and I think you said it was when you were about ten
4 or 12 years old?

5 A Right.

6 Q Is that accurate?

7 A Yeah.

8 Q Was there any period of time after
9 when you were ten or 12 years old that you remember
10 Dayton Tire and Rubber bringing material to the
11 site?

12 A I think I mentioned -- I'm not a
13 hundred percent sure at this point, but I think I
14 said when I was younger I remember the horse on the
15 emblem. That stuck with me.

16 Q So is that when you were ten or 12
17 or --

18 A I think I was younger than that.

19 Q How old were you when you remember
20 seeing the horse with the emblem?

21 A Maybe eight or nine when I started
22 getting into the dump itself.

23 Q So if I understand your testimony
24 then, the period of time during which you recall
25 seeing trucks which you believe were Dayton Tire

1 and Rubber trucks because you remember the horse
2 emblem --

3 A Right.

4 Q -- was from the time you were about
5 eight until the time you were about 12; is that
6 fair?

7 A Yeah.

8 Q Is that the sum total of the period
9 of time that you recall seeing these trucks that
10 you associate with Dayton Tire and Rubber at the
11 facility?

12 A I associated tires with the
13 particular trucks that came in. And so when I
14 worked for Doyle's Auto Parts I don't remember
15 whose truck would dump and whose truck would haul
16 off. Like I mentioned before, that was I think
17 around when recapping came in. So there would be
18 big trucks that were encaged that had -- so I don't
19 know.

20 Q So you may -- what you're saying is,
21 you may be confusing trucks coming in to unload
22 material with trucks that were actually taking
23 tires off the site from Doyle's? Is that what
24 you're telling me?

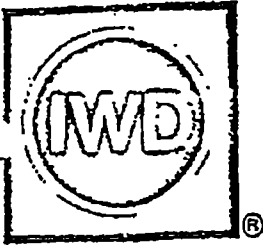
25 A Well, I could see 'em take 'em off.

DEPOSITION
EXHIBIT

Exhibit 4
etc



EXHIBIT 3



INDUSTRIAL WASTE DISPOSAL CO., INC.

P. O. BOX 1453 3973 WAGONER FORD ROAD • DAYTON, OHIO 45414

PHONE 513 278-0821

May 7, 1980

Dayton Tire & Rubber
P.O. Box 96
2342 Riverside Drive
Dayton, Ohio 45407

Attn: Mr. Ralph Ball

Dear Mr. Ball:

The purpose of this letter is to trace the history of your waste disposal by listing in chronological order the sanitary landfills IWD has utilized for the disposal of your waste since 1956.

- (A) From 1956 to 1960, your waste material was dumped at the Roger Groves Landfill located on River Road, Dayton, Ohio.
- (B) For the period from 1960 to 1966, your waste was taken to both the above Groves Landfill and Sanitary Landfill Inc. (a subsidiary of IWD) located on Dorothy Lane.
- (C) From 1966 to 1971, we used North Sanitary Landfill, Inc. (a subsidiary of IWD) located on the east side of Valleycrest Drive.
- (D) From 1971 to 1976, two sites were used; North Sanitary Landfill, Inc. (a subsidiary of IWD) located on the west side of Valleycrest Drive, and Sanitary Landfill, Inc. (a subsidiary of IWD) located on Cardington Road.
- (E) From 1976 to 1979, only Sanitary Landfill, Inc. on Cardington Road was utilized.
- (F) Effective in October 1979 to the present, your waste has been dumped at North Sanitary Landfill Inc. (a subsidiary of IWD) located on Pinnacle Road.

All of the above disposal sites either were or are properly licensed by all local, state, and federal regulatory agency requirements in existence at their respective times of operations.

100936

INDUSTRIAL WASTE DISPOSAL CO., INC.

Dayton Tire & Rubber
Mr. Ralph Ball
May 7, 1980
Page -2-

As soon as possible, IWD would like to be informed of a definite timetable for us to begin removing our waste removal equipment from your plant. In addition, we are interested in purchasing the one stationary compactor owned by DT&R which is used for corrugated recycling. We are also interested in purchasing your tire shredder.

Please do not hesitate to call with any questions or problems.

Sincerely yours,

Dennis R. Mantel

Dennis R. Mantel
Vice President of Sales

DEM;kb

100937

EXHIBIT 4

SOLID WASTE PROFILE

1977

Category	A Amount of Waste, in Fiscal 1977* (Thousands of Pounds)	B To the Nat'l. Hazardous? (If Yes, State Class?)	C Current Method of Disposal ⁽³⁾ (Check appropriate column)		E Sold (Show Approx. \$/lb realized)	F Remarks Brief remarks to clarify amount, disposi- tion, etc., (or plans you have to reduce amount of current waste, show % if possible)
			Sent to Dump or Landfill	Given Away (e.g., picked-up or no-charge)		
I. OTHER REFINED MATERIALS						
A. Tires	5,873.1	A	3,737.1	80.8	\$15,000/2,048.2	Sold to Xylos--lost on freight.
B. Tubes	N/A					
C. Bladders, Airtags, Flaps	530.4	A	146.8		\$2,051/181.4	Found buyer for bladders 4/77.
D. Trimming Vents	415.8	A	413.8			Trying to get power company to burn for fuel.
E. Trimming Flash (Included in "D")						Items D, E, F & G. If feasible, could
F. Grinding Dust	247.0	A	247.0			eliminate these items to landfill.
G. Lab Test Samples	12.1	A	12.1			
H. Other						
II. PLANT "GREEN" AND OTHER COMPONENT MTS.						
A. Green Tires	269.3	A	14.9		\$2,713/251.4	262.6 lbs. --one-shot, not normal.
B. Bend Wire	19.9	A	19.9			
C. Uncoated Fabric:						
Nylon	1.9	A	1.9			
Polyester	1.3	A	1.3			
Fiberglass	.5	A	.5			
Rayon	0		0			
Steelcord	0		0			
D. Coated Fabric:						
Nylon	593.6	A	0		\$24,030/593.6	Nylon, Poly, and glass coated. Some and
Polyester						recycled.
Fiberglass						
Rayon						
Steelcord	8.6	A	8.6			
E. Compounding:						
Oils						
Carbon Black	215.6	?	215.6			Carbon black and pigments.
Pigments						
Rubber (Synthetic & Natural)	222.3	A	222.3			
Fines, mixed compounds						
Solvents (in liquid form)						
F. Bantary cludge (See III C)						
G. Misc:						
III. OTHER MANUF./MAINTENANCE/STORES, ETC. ⁽⁴⁾						
A. Metals:						
Aluminum	8	No			\$163/.8	Recycle.
Copper/Brass	4.6	No			\$1,793/4.6	Recycle.
Lead	0					
Zinc	0					
Cast Iron	0					
Steel (incl. sheet metal)	332.3	No			\$6,619/332.3	Recycle.
Stainless Steel	0					
Unsorted metals	0					
Other	0					

Exhibit:
Wit: Reid
Date: 5-10-06
Rpt: DB